

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
FORT WAYNE DIVISION
CASE NO. 1:16-cv-00337-WCL-SLC

JEFFREY BROWN,)
)
Plaintiff,)
)
-vs-)
)
DEPUTY KYLE HARTMAN, DET. SHAUN)
DUNFIN, WANDA TRUELOVE, SHERIFF)
OF NOBLE COUNTY DOUGLAS A. HARP,)
STATE OF INDIANA/INDIANA)
DEPARTMENT OF CORRECTIONS)
(seeking perspective injunctive)
relief only), VICKI HALSELL and)
APRIL WILBURN,)
)
Defendants.)

30(b)(6) DEPOSITION OF BRENT MYERS

The 30(b)(6) deposition upon oral examination of BRENT MYERS, a witness produced and sworn before me, Rhonda J. Hobbs, RPR, Notary Public in and for the County of Hendricks, State of Indiana, taken on behalf of the Defendants, at the offices of Office of the Attorney General, Government Center South - 5th Floor, 302 West Washington Street, Indianapolis, Marion County, Indiana, on the 16th day of December, 2019, scheduled to commence at 10:00 a.m., pursuant to the Federal Rules of Civil Procedure with written notice as to time and place thereof.

Job No. CS3610902

<p>Page 2</p> <p>1 APPEARANCES</p> <p>2 FOR THE PLAINTIFF(S):</p> <p>Jeffrey Brown</p> <p>3</p> <p>Christopher C. Myers</p> <p>4 CHRISTOPHER C. MYERS & ASSOCIATES</p> <p>809 South Calhoun Street</p> <p>5 Suite 400</p> <p>Fort Wayne, IN 46802</p> <p>6 (Telephonic Appearance)</p> <p>7</p> <p>FOR THE DEFENDANT(S):</p> <p>8 KYLE HARTMAN, SHAUN DUNAFIN, WANDA</p> <p>TRUELOVE and DOUGLAS A. HARP</p> <p>9</p> <p>Robert T. Keen, Jr.</p> <p>10 BARRETT McNAGNY LLP</p> <p>215 East Berry Street</p> <p>11 Fort Wayne, IN 46802</p> <p>rtk@barrettllaw.com</p> <p>12</p> <p>FOR THE DEFENDANT(S):</p> <p>13 APRIL WILBURN</p> <p>14</p> <p>Adam G. Forrest</p> <p>15 BOSTON BEVER KLING CROSS & CHIDESTER</p> <p>27 North Eighth Street</p> <p>16 Richmond, IN 47374</p> <p>aforrest@bbkcc.com</p> <p>17</p> <p>FOR THE DEFENDANT(S)</p> <p>18 STATE OF INDIANA/INDIANA DEPARTMENT OF CORRECTION:</p> <p>19</p> <p>Bryan R. Findley</p> <p>20 OFFICE OF THE ATTORNEY GENERAL</p> <p>GOVERNMENT CENTER SOUTH - 5TH FLOOR</p> <p>21 302 WEST WASHINGTON STREET</p> <p>INDIANAPOLIS, IN 46204-2770</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>Page 4</p> <p>1 INDEX OF EXHIBITS</p> <p>2 Page</p> <p>3 Deposition Exhibits:</p> <p>4</p> <p>5 Exhibit F - State of Indiana Sex or 40</p> <p>Violent Offender Registration</p> <p>6 Form from Noble County Indiana</p> <p>7 Exhibit G - Email String 42</p> <p>8 Exhibit H - Investigative Notes Report for . 44</p> <p>Jeffrey Scott Brown (364741)</p> <p>9</p> <p>Exhibit I - Letter Dated March 14, 2016 to . 50</p> <p>10 Jeffrey S. Brown from Wanda</p> <p>Truelove</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p>Page 3</p> <p>1 INDEX OF EXAM</p> <p>2 Page</p> <p>3 DIRECT EXAMINATION 5</p> <p>Questions by Mr. Robert T. Keen, Jr.</p> <p>4 CROSS-EXAMINATION 52</p> <p>Questions by Mr. Christopher C. Myers</p> <p>5 CROSS-EXAMINATION 54</p> <p>Questions by Mr. Adam G. Forrest</p> <p>6</p> <p>INDEX OF EXHIBITS</p> <p>7 Page</p> <p>8 Deposition Exhibits:</p> <p>9 Exhibit A - Amended Notice of Rule 6</p> <p>30(b)(6) Deposition</p> <p>10</p> <p>Exhibit B - Document Titled, "Notification . 10</p> <p>of Sex and Violent Offender</p> <p>11 Registration Responsibilities and</p> <p>Other Duties"</p> <p>12</p> <p>Exhibit C - Document Titled, "Notification . 15</p> <p>of Requirement to Register as a</p> <p>13 Sex or Violent Offender"</p> <p>14</p> <p>Exhibit D - Document Titled, 17</p> <p>"Classification Appeal"</p> <p>16</p> <p>Exhibit E - Release Authorization, Release . 21</p> <p>17 Checklist, Memorandum Dated</p> <p>8/30/2012, Form from the Fort</p> <p>18 Wayne Parole District (PD#2),</p> <p>Conditional Parole Release</p> <p>19 Agreement, Letter by M. Zenk to</p> <p>Brown, Jeffrey, Notification of</p> <p>20 Sex and Violent Offender</p> <p>Registration Responsibilities and</p> <p>21 Other Duties, Parole Stipulations</p> <p>for Sex Offender, Sex or Violent</p> <p>22 Offender Registration Form,</p> <p>Temporary Leave Agreement for a</p> <p>23 Committed Offender, Form from the</p> <p>New Castle Correctional Facility</p> <p>24 Classification Department, IDACS</p> <p>Form, Request for Bus Voucher,</p> <p>25 Gateage Worksheet and Offender</p> <p>Trust System</p>	<p>Page 5</p> <p>1 (Time Noted 10:01 a.m.)</p> <p>2 BRENT MYERS,</p> <p>3 having been duly sworn to tell the truth, the whole</p> <p>4 truth, and nothing but the truth relating to said</p> <p>5 matter, was examined and testified as follows:</p> <p>6</p> <p>7 DIRECT EXAMINATION,</p> <p>8 QUESTIONS BY MR. ROBERT T. KEEN, JR.:</p> <p>9 Q Please state your name.</p> <p>10 A It's Brent Myers.</p> <p>11 Q Your address?</p> <p>12 A Here at work?</p> <p>13 Q Your work address is fine.</p> <p>14 A Okay. 302 West Washington Street, Suite E-334,</p> <p>15 Indianapolis, Indiana 46204.</p> <p>16 Q Where is it that you work?</p> <p>17 A The Indiana Department of Correction.</p> <p>18 Q You go by Brent?</p> <p>19 A Yes.</p> <p>20 Q So do you mind if I call you that?</p> <p>21 A Absolutely.</p> <p>22 Q I'm Bob Keen. I represent Noble County</p> <p>23 Defendants in a lawsuit that Jeffrey Brown has</p> <p>24 filed. We're here today to take your deposition</p> <p>25 in connection with that case.</p>

<p style="text-align: right;">Page 6</p> <p>1 Have you ever given a deposition before?</p> <p>2 A I have.</p> <p>3 Q So you understand generally the ground rules</p> <p>4 that -- Rhonda's the court reporter, and she</p> <p>5 just swore you in?</p> <p>6 A Yes.</p> <p>7 Q And we're going to be asking you a series of</p> <p>8 questions. You need to answer all of those</p> <p>9 questions with verbal responses so she can take</p> <p>10 your testimony down accurately.</p> <p>11 A Yes.</p> <p>12 Q If you don't understand a question that I ask,</p> <p>13 tell me, and I'll try and ask a clearer</p> <p>14 question.</p> <p>15 A Yes.</p> <p>16 Q It's also helpful to Rhonda if we don't talk at</p> <p>17 the same time. So if you can be patient and let</p> <p>18 me finish my entire question before you start</p> <p>19 your answer, I'll give you that same courtesy.</p> <p>20 A Okay.</p> <p>21 (Deposition Exhibit A marked for</p> <p>22 identification.)</p> <p>23 Q We're here today pursuant to a 30(b)(6)</p> <p>24 deposition notice, actually an amended notice.</p> <p>25 I've marked as Defendant's Exhibit A.</p>	<p style="text-align: right;">Page 8</p> <p>1 MR. KEEN: We can go off the record.</p> <p>2 (A discussion was held off the record.)</p> <p>3 Q Brent, how long have you held that position?</p> <p>4 A That position was probably back to 2008, 2009.</p> <p>5 Q Okay. How many employees do you oversee in that</p> <p>6 position?</p> <p>7 A Currently, with both state staff and contractual</p> <p>8 folks, I believe it is 12.</p> <p>9 Q When you say "contractual folks," are you</p> <p>10 talking about the private prison folks or</p> <p>11 someone else?</p> <p>12 A No. I'm talking the individuals that are in my</p> <p>13 division that are from a group called knowledge</p> <p>14 services that provides temporary support to the</p> <p>15 state.</p> <p>16 Q I see. What did you do before 2008?</p> <p>17 A I was with the Department of Correction, but it</p> <p>18 was more in a research-oriented position. Some</p> <p>19 of that was still related to registration</p> <p>20 activities, but it was a variety of things as</p> <p>21 well.</p> <p>22 Q Okay. How long have you been with the Indiana</p> <p>23 Department of Corrections all together then?</p> <p>24 A Since 2005, late 2005.</p> <p>25 Q So as the director of registration, what are the</p>
<p style="text-align: right;">Page 7</p> <p>1 Have you seen this document before?</p> <p>2 A I have.</p> <p>3 Q And have you been designated by the Indiana</p> <p>4 Department of Corrections and the State of</p> <p>5 Indiana to respond to questions on these various</p> <p>6 topics?</p> <p>7 A Yes, I have.</p> <p>8 Q Are there any of the topics that you're not</p> <p>9 prepared to answer questions concerning?</p> <p>10 A I believe I can answer questions for each of the</p> <p>11 topics.</p> <p>12 Q All right. Before we delve into the substantive</p> <p>13 questions, maybe a little bit more background</p> <p>14 about you.</p> <p>15 What's your job with the Indiana Department</p> <p>16 of Corrections?</p> <p>17 A I'm the Director of Registration and Victim</p> <p>18 Services.</p> <p>19 Q What are your job duties and responsibilities in</p> <p>20 that regard?</p> <p>21 A I receive the Department's efforts with sex and</p> <p>22 violent offender registration, and I also</p> <p>23 oversee the Department's efforts with victim</p> <p>24 notification, victim services, and related types</p> <p>25 of activities.</p>	<p style="text-align: right;">Page 9</p> <p>1 job duties and responsibilities of your</p> <p>2 department day in day out, what do you do?</p> <p>3 A We make registration decisions for individuals</p> <p>4 that are required to register, or that we</p> <p>5 believe may have an obligation to register. We</p> <p>6 work with local sheriff's departments. We work</p> <p>7 with other justice professionals, and that could</p> <p>8 be helping them with their understanding of</p> <p>9 registration. It could be making registration</p> <p>10 decisions for them. Ultimately, it's just</p> <p>11 communicating about sex and violent offender</p> <p>12 registrations here in Indiana.</p> <p>13 Q Does your department have the final say in</p> <p>14 determining who is designated as someone who</p> <p>15 needs to register under the sex offender's law?</p> <p>16 A We do. We make that determination when</p> <p>17 information is presented to us.</p> <p>18 Q And has that been true since 2008, 2009?</p> <p>19 A It has.</p> <p>20 Q This particular case involves a plaintiff by the</p> <p>21 name of Jeffrey Brown who was an inmate with the</p> <p>22 Indiana Department of Corrections at various</p> <p>23 times over the last 25 years or so. And the</p> <p>24 notice of deposition indicates that there will</p> <p>25 be questions concerning his particular status</p>

<p style="text-align: right;">Page 10</p> <p>1 with the Department of Corrections, and his</p> <p>2 being designated as someone who needed to</p> <p>3 register as a sex offender.</p> <p>4 Have you looked into his particular file in</p> <p>5 preparation for the deposition today?</p> <p>6 A Yes, I have.</p> <p>7 Q Were you involved in making the decision -- you</p> <p>8 personally involved in making decisions, over</p> <p>9 the last ten years or so, concerning Mr. Brown</p> <p>10 and whether or not he had to register as a sex</p> <p>11 offender?</p> <p>12 A I do not believe so.</p> <p>13 Q It would have been people working under you and</p> <p>14 your staff; however?</p> <p>15 A Yes.</p> <p>16 (Deposition Exhibit B marked for</p> <p>17 identification.)</p> <p>18 Q I'm going to show you now what's been marked as</p> <p>19 Defendant's Exhibit B, although that has an A on</p> <p>20 it from another deposition but this is B. Can</p> <p>21 you identify what Exhibit B is?</p> <p>22 A This is a document that informs an individual</p> <p>23 that he has an obligation to register.</p> <p>24 Q And this is a document in particular with regard</p> <p>25 to Jeffrey Brown?</p>	<p style="text-align: right;">Page 12</p> <p>1 A Yes.</p> <p>2 Q Who makes that -- who made that determination in</p> <p>3 February of 2009?</p> <p>4 A I can't specifically say what individual or what</p> <p>5 entity made that decision. My guess would be</p> <p>6 that the facility actually made that decision.</p> <p>7 Q And explain to us, then, how the procedure</p> <p>8 worked in 2009. Was your department responsible</p> <p>9 for initially making some determination as to</p> <p>10 whether someone had to register as a sex</p> <p>11 offender, or was that left up to employees with</p> <p>12 the particular facility, correctional facility,</p> <p>13 where the inmate was housed?</p> <p>14 A It was inconsistent. There may have been people</p> <p>15 that reached out to us and asked us questions</p> <p>16 about a specific individual. We may have had</p> <p>17 more input on other individuals, whereas opposed</p> <p>18 to individuals who we may have no input on</p> <p>19 whatsoever.</p> <p>20 Q Okay. Is the procedure in place today different</p> <p>21 than it was in 2009?</p> <p>22 A Yes.</p> <p>23 Q How so?</p> <p>24 A Today, the procedure in place is we make all the</p> <p>25 decisions. We actually provide a document,</p>
<p style="text-align: right;">Page 11</p> <p>1 A That is correct.</p> <p>2 Q Dated February 19, 2009?</p> <p>3 A Correct.</p> <p>4 Q And it's titled, "Notification of Sex and</p> <p>5 Violent Offender Registration Responsibilities</p> <p>6 and Other Duties;" correct?</p> <p>7 A Correct.</p> <p>8 Q Is this a form from the Indiana Department of</p> <p>9 Corrections that existed in February of 2009?</p> <p>10 A I believe so, yes.</p> <p>11 Q Who completes this particular form within the</p> <p>12 Indiana Department of Corrections?</p> <p>13 A This form I would suspect was likely -- well,</p> <p>14 this form was filled out by the facility that</p> <p>15 would have released Mr. Brown.</p> <p>16 Q And in this particular circumstance, I believe</p> <p>17 that facility was the New Castle Correctional</p> <p>18 Facility?</p> <p>19 A I believe so.</p> <p>20 Q At the top of the form, there's a list of</p> <p>21 potential categories of sex offender A through</p> <p>22 D, and there is -- only the box D is marked. It</p> <p>23 says, "How long is the offender required to</p> <p>24 register," and it's marked for life, do you see</p> <p>25 that?</p>	<p style="text-align: right;">Page 13</p> <p>1 although not this document, a similar type of a</p> <p>2 document that we actually send out to staff at</p> <p>3 each of the facilities where an individual is</p> <p>4 being released. So they see our determination</p> <p>5 information on the document that they would</p> <p>6 actually then present to the individual to have</p> <p>7 him or her sign.</p> <p>8 Q When did that procedure change?</p> <p>9 A Formally, I believe it changed in 2015.</p> <p>10 Q Informally?</p> <p>11 A Informally, probably in 2014, maybe even late</p> <p>12 '13.</p> <p>13 Q Do you know why that procedure was changed at</p> <p>14 that time?</p> <p>15 A We believed it was inconsistent, that it</p> <p>16 wasn't -- we weren't getting consistent</p> <p>17 decisions from facility to facility, and so we</p> <p>18 wanted to make sure that it was one entity</p> <p>19 making decisions as opposed to individual</p> <p>20 facilities making decisions.</p> <p>21 Q Does that mean that you found at times that</p> <p>22 inmates that should not have had to register</p> <p>23 were being required to register?</p> <p>24 A There could have been those situations, but more</p> <p>25 generally it was just simply that decisions were</p>

<p style="text-align: right;">Page 14</p> <p>1 being made by each of our facilities, and we</p> <p>2 thought it made much more sense to have that</p> <p>3 centralized with one individual or a group of</p> <p>4 individuals.</p> <p>5 Q On this exhibit, Defendant's Exhibit B, about</p> <p>6 midway down the page, it references current</p> <p>7 status, and it has boxes checked, parole and</p> <p>8 probation. Back in 2009, who made those</p> <p>9 determinations?</p> <p>10 A The -- can you clarify that question for me?</p> <p>11 Q Sure. This Exhibit B has this -- these boxes</p> <p>12 midway down the page that say current status,</p> <p>13 and there's a number of different boxes and this</p> <p>14 one was checked parole and probation. I'm</p> <p>15 trying to figure out if that's something that</p> <p>16 someone at the New Castle Correctional Facility</p> <p>17 determined, or were they informed that this is</p> <p>18 the status of the inmate upon release?</p> <p>19 A The form would have been filled out, again, by</p> <p>20 someone at a facility. However, in a particular</p> <p>21 case of parole or probation, that is really</p> <p>22 defined under Indiana code. If someone receives</p> <p>23 a split sentence, then they would have some kind</p> <p>24 of a probation or a court supervision</p> <p>25 obligation; whereas, if they don't have that</p>	<p style="text-align: right;">Page 16</p> <p>1 Requirement to Register as a Sex or Violent</p> <p>2 Offender," do you see that?</p> <p>3 A I do.</p> <p>4 Q But you don't know whether this document was</p> <p>5 generated at the correctional facility or some</p> <p>6 other place?</p> <p>7 A I do not.</p> <p>8 Q This is -- is it a form you don't recognize?</p> <p>9 A This form is not familiar to me.</p> <p>10 Q As part of the discovery in this case, we</p> <p>11 requested all documents with the Department of</p> <p>12 Corrections that related to Jeffrey Brown, and</p> <p>13 his registration as a sex offender, his status</p> <p>14 in that regard. And we received a lot of</p> <p>15 documents, but I believe the documents that</p> <p>16 related to his release in 2009, were limited to</p> <p>17 Exhibit B.</p> <p>18 Did you do any -- as part of that, any</p> <p>19 search to determine whether the Department had</p> <p>20 any other records related to the determination</p> <p>21 that he register as a sex offender at that time,</p> <p>22 when he was released in 2009?</p> <p>23 A I looked at the information that we have, and I</p> <p>24 did find a copy of Exhibit B.</p> <p>25 Q Any other related documents in your files that</p>
<p style="text-align: right;">Page 15</p> <p>1 split sentence, they're going to be released to</p> <p>2 parole.</p> <p>3 Q So that information was somehow provided</p> <p>4 apparently to someone with the correctional</p> <p>5 facility in New Castle where Mr. Brown was</p> <p>6 housed at the time?</p> <p>7 A It could have been provided to them, or they</p> <p>8 simply could have looked at Indiana code, and</p> <p>9 the individual sentence, and his conviction to</p> <p>10 make that determination.</p> <p>11 (Deposition Exhibit C marked for</p> <p>12 identification.)</p> <p>13 Q Okay. I'm going to show you another document</p> <p>14 marked as Defendant's Exhibit C. Can you tell</p> <p>15 us what Exhibit C is?</p> <p>16 A This is not, as far as I know, a document from</p> <p>17 the Department of Correction. What it appears</p> <p>18 to be is a document that -- or at least it's not</p> <p>19 a document that I've seen from the Indiana</p> <p>20 Department of Correction.</p> <p>21 It appears to be a document -- it's</p> <p>22 providing some instructions to Mr. Brown upon</p> <p>23 what he's supposed to do with release from the</p> <p>24 Department of Correction, it appears.</p> <p>25 Q It's titled at the top, "Notification of</p>	<p style="text-align: right;">Page 17</p> <p>1 you could locate at that time?</p> <p>2 A There was a secondary notification, looking very</p> <p>3 similar to this, from 2012.</p> <p>4 Q Right. But I was talking about specifically for</p> <p>5 the 2009.</p> <p>6 A In the documents that I saw, or the information</p> <p>7 that I reviewed, no.</p> <p>8 (Deposition Exhibit D marked for</p> <p>9 identification.)</p> <p>10 Q Okay. Let me show you what's marked as</p> <p>11 Exhibit D. If you could identify Defendant's</p> <p>12 Exhibit D for us?</p> <p>13 A This is a classification appeal through our</p> <p>14 classification division in the Department of</p> <p>15 Correction.</p> <p>16 Q And this is -- well, it was initially dated</p> <p>17 March the 12th of 2012; right?</p> <p>18 A Well, it's signed -- I mean there's initials or</p> <p>19 something at the top, and it's March maybe 15th,</p> <p>20 2012, and there's a date at the bottom that's</p> <p>21 June 18th, 2012.</p> <p>22 Q But this is an appeal from Jeffrey Brown</p> <p>23 regarding his classification as a sex offender;</p> <p>24 correct?</p> <p>25 A It appears to be the case, yes.</p>

<p style="text-align: right;">Page 18</p> <p>1 Q And he submitted that -- or at least he signed 2 it on March the 12th, 2012, do you see that? 3 A Yes. 4 Q And it looks like it was directed to you; right? 5 A It does have my name, yes. 6 Q Tell us how this appeal process worked in 2012? 7 Just sort of walk us through that procedure. 8 A Well, this is a classification appeal that's 9 handled actually by the classification division 10 of the Department of Correction, which is not 11 the same division as the sex and violent 12 offender registration, and victim services 13 division. 14 So my understanding is a classification 15 appeal would have been submitted, and someone 16 would have looked into this, and made a decision 17 on whether or not the appeal issue, whatever it 18 happened to be, was valid. 19 Q So even though it was addressed to you, are you 20 saying that you would have forwarded it on to 21 someone else? 22 A No. What I'm actually saying is, I may have 23 never even seen a copy of this, because this is 24 a completely different division within the 25 Department of Correction.</p>	<p style="text-align: right;">Page 20</p> <p>1 A I can make out some of that. 2 Q Okay. Do you know whose signature is at the 3 bottom? 4 A I do not. 5 Q It looks like it's a J. French. Do you know 6 anyone by that name that works with the Indiana 7 Department of Corrections? 8 A There's an individual that was at -- and may 9 still be at the New Castle Correctional 10 Facility, her name is Jennifer French. 11 Q And it looks like a title -- it looks like AR 12 next to her name, do you know what that stands 13 for? 14 A I do not. 15 Q What was Jennifer French's job at the New Castle 16 Correctional Facility? 17 A I believe she was a -- maybe a deputy 18 commissioner -- or not a -- I apologize. She 19 dealt -- deputy superintendent, some of the -- 20 that type of label. 21 Q Does that mean she was an employee of GEO 22 Company that handles that facility? 23 A I believe so. She certainly worked for them, 24 and I believe she was an employee of that 25 company.</p>
<p style="text-align: right;">Page 19</p> <p>1 Q Do you know how Mr. Brown happened to get your 2 name? 3 A My name was likely listed on our website, it's 4 probably available in every law library around 5 the state, for the Department of Correction, and 6 he probably got it from that perspective, or may 7 have asked staff. 8 Q So, as far as you know, not only you but no one 9 else in your department would have actually 10 reviewed this classification appeal? 11 A I do not recall reviewing this and seeing this, 12 but who actually did, I don't know. 13 Q The particular appeal that Mr. Brown is making 14 at this time appears that it was his belief that 15 he should not have to register as a sex offender 16 for life, given his conviction; correct? 17 A If I may, I want to read the paragraph here. 18 Q Yeah, please do. 19 A Yes. So he is alleging that he didn't have to 20 register for life, it was only a 10-year 21 registration obligation. 22 Q Down at the bottom of Exhibit D there's some 23 writing from someone else, not Mr. Brown, that 24 appears to be a response from his appeal. Are 25 you able to read that person's writing?</p>	<p style="text-align: right;">Page 21</p> <p>1 Q And GEO is G-E-O, in caps. It looks like she 2 wrote, "Registration is not a function of the 3 facility, so not a classification issue. You 4 may petition the court," do you see that? 5 A I do. 6 Q Do you know what she's talking about there? 7 A If I had to speculate, I would guess that she's 8 saying the individual could go back to court and 9 challenge his registration requirements, likely 10 under IC11-8-8-22. 11 Q Okay. As far as you were able to determine, 12 this appeal of Mr. Brown, after this response 13 was received from Ms. French, never made its way 14 back to your department from there? 15 A Based on -- yes. I have no reason to believe 16 that I had this, or I certainly didn't see this 17 when I prepared for the deposition. 18 (Deposition Exhibit E marked for 19 identification.) 20 Q I'm going to hand you a packet of documents now 21 that I received -- I think they were all 22 received from the Indiana Department of 23 Corrections, and the state of Indiana in 24 response to my request. So there's a number of 25 different documents I'm going to ask you about,</p>

Page 22

1 but I think they all relate to Mr. Brown's
 2 release in September of 2012. So why don't you
 3 take a minute to look through those.
 4 A (Witness complies.)
 5 Q This is marked as Exhibit E.
 6 MR. MYERS: Hey, Bob, this is Chris, so can
 7 we come to an understanding that when you get
 8 back to Fort Wayne, can I just go ahead and go
 9 to your office and get copies of all these
 10 exhibits?
 11 MR. KEEN: Yes, that will be fine.
 12 Q Brent, have you had an opportunity to look at
 13 all the packet of documents contained in
 14 Defendant's Exhibit E?
 15 A Yes, I have.
 16 Q Have you seen these documents before?
 17 A I have.
 18 Q Let's go -- if we could go through maybe each
 19 page in the order that they're shown here in
 20 Exhibit E. What's -- the first page that says,
 21 "Release authorization," what's that?
 22 A My understanding of this document -- again these
 23 documents do not come from my division. My
 24 understanding is this is a document that
 25 initiates the release authorization from the

Page 23

1 Department of Correction, so the individual has
 2 approached the end of their sentence and is
 3 going to be released.
 4 Q It does say, though, at the top right corner,
 5 that it's an "Indiana Department of Corrections
 6 Sentence Computation and Release" form; correct?
 7 A Correct.
 8 Q Does that mean that it's a form that is issued
 9 by the Indiana Department of Corrections, even
 10 though not from your particular department?
 11 A Yes. It is a form used by -- in the management
 12 and release process for offenders out of DOC.
 13 Q And this is for Jeffrey Brown at the New Castle
 14 Facility; correct?
 15 A That is correct.
 16 Q And it's dated December 6th, 2012. And there's
 17 a person's name listed, Tonya, I don't know how
 18 to pronounce her last name, but it's W-o-i-d-a,
 19 Release Specialist 3, do you know who that is?
 20 A I do.
 21 Q Who is she?
 22 A She is an individual that works, I believe still
 23 does work, for the Department of Correction in
 24 the classification and release division.
 25 Q Would that be your division?

Page 24

1 A No, that is not my division.
 2 Q Okay. How is it different from your division?
 3 What are their job duties and responsibilities
 4 that -- how do they differ from what your
 5 department does?
 6 A The classification division handles all
 7 classification types of issues, sentence
 8 computation, earned credit, release types of
 9 activities.
 10 Q Okay.
 11 A And they deal with not only sex offenders, but
 12 all offenders from the Department of Correction.
 13 Q So a more generalized department, then?
 14 A That is correct.
 15 Q In the middle of the first page there's -- it's
 16 written, handwritten in there, "Lifetime
 17 registry," do you see that?
 18 A I do.
 19 Q Do you know who wrote that?
 20 A I would suspect Tonya wrote that, but I do not
 21 know.
 22 Q And what is your understanding of what that
 23 meant?
 24 A Other than simply what the words state, I have
 25 no understanding other than that simply there's

Page 25

1 a -- what appears to be a star, an asterisk,
 2 where it says "lifetime registry."
 3 Q Well, at the time, in September of 2012, were
 4 there any kind of other registries besides the
 5 sex offender registry that inmates would have to
 6 register for when they were released?
 7 A No, I believe it would be the sex and violent
 8 offender register.
 9 Q Does that suggest to you that Tonya made some
 10 determination at some point, in September of
 11 2012, that Mr. Brown was subject to the lifetime
 12 regis -- sex registration requirements?
 13 A Whether it was Tonya or somebody else, I would
 14 say somebody made that decision, yes.
 15 Q Do you know why that wasn't made through your
 16 department, as opposed to her department?
 17 A Again, I don't know if -- it's a different
 18 function of the DOC. However, in 2012, with
 19 Mr. Brown, we still would have said he was
 20 required to register. We were acting on legal
 21 advice that indicated that individuals had to go
 22 back to court and get any registration
 23 obligations removed by a court, before we would
 24 apply those.
 25 Q And that legal advice would have been through

<p style="text-align: right;">Page 26</p> <p>1 the Indiana Attorney General's office?</p> <p>2 A In this case, it was.</p> <p>3 Q Was it specific to Mr. Brown, or was this the</p> <p>4 general advice for all inmates that were, at</p> <p>5 that time, subject to the lifetime registration</p> <p>6 requirements?</p> <p>7 A It was specific advice as for the implementation</p> <p>8 Wallace v. State.</p> <p>9 Q And explain to us what Wallace v. State was.</p> <p>10 A Wallace v. State was a case that came down I</p> <p>11 believe April 30th, 2009, that questioned</p> <p>12 whether or not sex and violent offender</p> <p>13 registration could be enacted retroactively.</p> <p>14 Q And what did the court say?</p> <p>15 A The court said in -- our understanding was it</p> <p>16 was an "as applied decision" to Richard Wallace,</p> <p>17 and the court indicated because of his situation</p> <p>18 of committing, being convicted of, and</p> <p>19 completing his sentence, that he was no longer</p> <p>20 obligated to register, he didn't have notice of</p> <p>21 that obligation.</p> <p>22 Q But the -- it was the attorney's general's</p> <p>23 advice, following that decision, to your</p> <p>24 department that that decision only applied to</p> <p>25 him; correct?</p>	<p style="text-align: right;">Page 28</p> <p>1 sure all the I's were dotted and T's were</p> <p>2 crossed.</p> <p>3 Q Let's turn to the second page of Exhibit E, and</p> <p>4 it's entitled "A Release Checklist." Are you</p> <p>5 familiar with this form?</p> <p>6 A Yes.</p> <p>7 Q What's its purpose?</p> <p>8 A It's the same type of thing. It's to assure</p> <p>9 that all the different steps have been</p> <p>10 completed, to make sure that we have a good</p> <p>11 release as a department, for the individual.</p> <p>12 Q Okay. And this is specific to Jeffrey Brown;</p> <p>13 correct?</p> <p>14 A Yes.</p> <p>15 Q And it shows date at the top of September 8th,</p> <p>16 2012, and then at the bottom it says September 5</p> <p>17 of 2012, do you know why the dates don't match?</p> <p>18 A My guess -- I do not know definitively, but my</p> <p>19 guess is -- again, this is a checklist to make</p> <p>20 sure that all the steps have been completed, and</p> <p>21 my guess is that it was initiated on</p> <p>22 September 7th, and completed on -- well, I guess</p> <p>23 that would have been backwards in time. So I'm</p> <p>24 not sure why there is a difference.</p> <p>25 Q Okay. Is this a --</p>
<p style="text-align: right;">Page 27</p> <p>1 A Yes.</p> <p>2 Q And that if -- if any other inmate believed they</p> <p>3 shouldn't be subject to the lifetime</p> <p>4 registration requirements, or the requirements</p> <p>5 to register as a sex offender, that they</p> <p>6 individually had to seek that determination from</p> <p>7 a court?</p> <p>8 A That is correct.</p> <p>9 Q That was -- and that was the policy of the</p> <p>10 Department of Corrections in 2012?</p> <p>11 A It was in 2011, 2012. At some point it did</p> <p>12 change, and we currently no longer operate under</p> <p>13 that.</p> <p>14 Q Understood. And I guess we'll get to that going</p> <p>15 forward. But this is -- the first page, this</p> <p>16 release authorization, this is something that</p> <p>17 would have been then sent to the New Castle</p> <p>18 Correctional Facility where Mr. Brown was being</p> <p>19 housed; right?</p> <p>20 A I am not so sure it would have been sent to</p> <p>21 them. My understanding -- and, again, this is a</p> <p>22 different division in DOC, but my understanding</p> <p>23 is these are documentation -- or documentation</p> <p>24 that could have been sent, but it also could</p> <p>25 have been documentation internally, just to make</p>	<p style="text-align: right;">Page 29</p> <p>1 MR. MYERS: Bob, EPRD at the top, Estimated</p> <p>2 Parole Release Date.</p> <p>3 MR. KEEN: Oh, okay. Thank you.</p> <p>4 MR. FINDLEY: So it's not --</p> <p>5 MR. KEEN: I get it.</p> <p>6 Q That's the date he was expected to be released</p> <p>7 that I -- okay.</p> <p>8 A Yes, that is correct.</p> <p>9 Q That makes sense.</p> <p>10 This checklist does indicate that Mr. Brown</p> <p>11 was subject to the sex registration</p> <p>12 requirements; correct?</p> <p>13 A It does have that checkmark, or that -- yes,</p> <p>14 indicator.</p> <p>15 Q And at the bottom it has April Wilburn as</p> <p>16 signing, and we know, from prior discovery in</p> <p>17 this case, that she worked at the New Castle</p> <p>18 Correctional Facility, is that your</p> <p>19 understanding as well?</p> <p>20 A I believe so.</p> <p>21 Q Above it is a signature of a superintendent, do</p> <p>22 you recognize that person's signature?</p> <p>23 A I believe that is a designee, and I believe that</p> <p>24 name is Sarah Young.</p> <p>25 Q Does she work for GEO at the New Castle</p>

<p style="text-align: right;">Page 30</p> <p>1 Correctional Facility, or with the Indiana 2 Department of Corrections here? 3 A I believe she worked for GEO, and I don't 4 believe she works for either at this point. 5 Q All right. So the third page of Exhibit E says 6 "New Castle Correctional Facility Memorandum," 7 and it does have an S. Young there, so that 8 seems to be consistent with the prior page; 9 correct? 10 A Yes. 11 Q All right. At the bottom it has an Indiana 12 Department of Corrections staff completing form 13 dated August 30 of 2012, do you know who signed 14 that? 15 A I do not. And, actually, the initial indicator 16 for the labeling of that is IDACS, so that's 17 Indiana Data Communication System Staff. 18 Q All right. Do we know what the purpose of going 19 through IDACS would be at that point? 20 A Before any individual is released from the 21 Department, we're looking for warrants, 22 detainers, holds, those types of activities. 23 Q All right. So that's why it shows clear, 24 meaning there weren't any active warrants for 25 Mr. Brown's arrest at that time?</p>	<p style="text-align: right;">Page 32</p> <p>1 right? 2 A That is correct. 3 Q Now, at the top of this particular form it 4 has -- in the Boxes A through D, it's checked 5 off that Mr. Brown has to register under 11-8-8, 6 and it's a lifetime requirement, do you see 7 that? 8 A Yes. 9 Q And then it has the rest of this information 10 signed at the bottom by April Wilburn. Is it 11 your understanding that all of the information 12 on this page would have been completed by 13 Ms. Wilburn as well? 14 A This form would have been filled out by 15 Ms. Wilburn, yes. 16 Q And do you know how she would have received 17 information that says that Mr. Brown had to 18 register as a sex offender for life? 19 A I do not know definitively. It could have been 20 that she made that decision on her own. It 21 could be that she reached out for information. 22 I do not know. 23 Q But it is true that back in September of 2012, 24 it was still a policy or position of the Indiana 25 Department of Corrections that this sex</p>
<p style="text-align: right;">Page 31</p> <p>1 A That would appear to be correct with us. 2 Q All right. The next page has "Fort Wayne Parole 3 District Information" there, is that simply to 4 notify Mr. Brown where he needs to report 5 pursuant to his parole? 6 A I believe so. 7 Q The next page, "Conditional Parole Release 8 Agreement," and, again, that has to do with his 9 parole requirements; correct? 10 A That is correct. 11 Q And that's signed by April Wilburn as well, on 12 September 5, 2012; right? 13 A That is correct. 14 Q All right. The next page is a GEO Group form. 15 Again, that has to do with his being notified of 16 his probation requirements; correct? 17 A That appears to be the case, yes. 18 Q Then the next form after -- the next page after 19 that is the "Notification of Sex and Violent 20 Offender Registration Responsibilities and Other 21 Duties." That's similar to what we saw with 22 Exhibit B; correct? 23 A That is correct. 24 Q And this is a form you did mention that you saw 25 before, when you prepared for the deposition;</p>	<p style="text-align: right;">Page 33</p> <p>1 registration requirement did apply to Mr. Brown? 2 A I believe, that's correct. 3 Q All right. So whatever information she got from 4 whatever source at that time, would have been in 5 compliance and in keeping with the standards and 6 the policy of the Indiana Department of 7 Corrections that placed that? 8 A I believe that is correct. 9 Q All right. It looks like the next three pages 10 have to do with Ms. Wilburn going over the 11 requirements for parole for sex offenders, and 12 making sure he reviewed all of those things; 13 correct? 14 A That is correct. 15 Q Then the -- so the third page, which actually is 16 Bates stamped State 137, has her signature at 17 the bottom, has Mr. Brown's signature at the 18 bottom, but it also has somebody else's 19 signature above theirs. It says, "Signature of 20 member of the Indiana Parole Board," do you see 21 that? 22 A I do. 23 Q Do you know that person's name that signed that? 24 A I believe it's Valerie Parker. 25 Q And it looks like it was signed on July 23rd of</p>


<p style="text-align: right;">Page 34</p> <p>1 2012; correct?</p> <p>2 A It's July 23rd, 2000 and something.</p> <p>3 Q Okay. What was Ms. Parker's position with the</p> <p>4 Indiana Parole Board at that time, in 2012?</p> <p>5 A She was actually an appointed member of the</p> <p>6 Indiana Parole Board.</p> <p>7 Q And in that capacity, what were her job duties</p> <p>8 and responsibilities?</p> <p>9 A To my understanding, she made determinations in</p> <p>10 partnership with her colleagues, to determine</p> <p>11 parole stipulations and whether or not there</p> <p>12 were violations and so forth with offenders that</p> <p>13 were on parole.</p> <p>14 Q So would that board have been responsible for</p> <p>15 determining that, as part of Mr. Brown's parole,</p> <p>16 that he be subject to the sex registration</p> <p>17 requirements?</p> <p>18 A If they enforced a stipulation that required sex</p> <p>19 and violent offender registration, it would have</p> <p>20 been their obligation to implement that</p> <p>21 stipulation.</p> <p>22 Q So is it your understanding that Ms. Parker, in</p> <p>23 conjunction with her work with the other members</p> <p>24 of the board, would have come up with all the</p> <p>25 requirements for Mr. Brown's parole, then, in</p>	<p style="text-align: right;">Page 36</p> <p>1 Q Okay. And this has Mr. Brown's signature, as</p> <p>2 well as April's signature at the bottom as well?</p> <p>3 A That is correct.</p> <p>4 Q The next page apparently just has to do with the</p> <p>5 release information for Mr. Brown, and his</p> <p>6 obligations; right?</p> <p>7 A Yes.</p> <p>8 Q It looks like the next page has to do with</p> <p>9 transportation of Mr. Brown from the facility;</p> <p>10 right?</p> <p>11 A Yes.</p> <p>12 Q Do you know what the next page is?</p> <p>13 A This appears to be a printout of IDACS or NCIC</p> <p>14 information.</p> <p>15 Q So this was the search they did to make sure he</p> <p>16 was clear of warrants?</p> <p>17 A That appears to be the case.</p> <p>18 Q All right. The next page has to do with the bus</p> <p>19 voucher to get back from -- to Noble County;</p> <p>20 correct?</p> <p>21 A Correct.</p> <p>22 Q And the next page has to do with getting money</p> <p>23 for his bus fair and return of his commissary;</p> <p>24 right?</p> <p>25 A Looks to be correct.</p>
<p style="text-align: right;">Page 35</p> <p>1 September of 2012, that are reflected in these</p> <p>2 prior pages, because it says 1 through 25?</p> <p>3 A My understanding, by her signature, she's</p> <p>4 acknowledging for the board that they support</p> <p>5 those stipulations for that individual.</p> <p>6 Q Okay.</p> <p>7 A For Mr. Brown.</p> <p>8 Q All right. And that they're so notifying the</p> <p>9 individual correctional facility of that as</p> <p>10 well?</p> <p>11 A How that works between the facility and the</p> <p>12 parole board, I do not know, but it certainly</p> <p>13 indicates that the board acknowledged those</p> <p>14 obligations.</p> <p>15 Q The next page of Exhibit E is entitled "Sex or</p> <p>16 Violent Offender Registration form." This is an</p> <p>17 Indiana Department of Corrections form as well;</p> <p>18 right?</p> <p>19 A I believe this is actually a copy of a</p> <p>20 registration form out of the registration tool,</p> <p>21 so the offender watch application.</p> <p>22 Q What's the difference?</p> <p>23 A The offender watch application is the tool that</p> <p>24 DOC and local sheriffs use to register sex and</p> <p>25 violent offenders.</p>	<p style="text-align: right;">Page 37</p> <p>1 Q All right. And what's the last page have to do</p> <p>2 with?</p> <p>3 A This appears to be screen printouts showing the</p> <p>4 offender trust account, which would relate back</p> <p>5 to the previous document and the money that was</p> <p>6 provided to him.</p> <p>7 Q Is it your understanding, Brent, that when an</p> <p>8 individual is designated as someone who has to</p> <p>9 register as a sex offender upon release from a</p> <p>10 correctional facility, that they have to report</p> <p>11 to the county sheriff where they're going to</p> <p>12 reside as part of that registration requirement?</p> <p>13 A That is correct.</p> <p>14 Q And that this paperwork is forwarded to that</p> <p>15 particular sheriff's department office so they</p> <p>16 know that someone's coming for that purpose?</p> <p>17 A Can you clarify which paperwork?</p> <p>18 Q So is there some paperwork, then, that comes</p> <p>19 from the Department of Corrections to the local</p> <p>20 sheriff's department to notify the sheriff that</p> <p>21 someone is going to be coming to register as a</p> <p>22 sex offender to their particular county</p> <p>23 facility?</p> <p>24 A There is, but that process has changed quite a</p> <p>25 bit over the years as well.</p>

<p style="text-align: right;">Page 38</p> <p>1 Q Back in 2012, what was the procedure for that?</p> <p>2 A There would have been certain documents that</p> <p>3 would have been faxed to the local sheriff's</p> <p>4 department indicating that an offender had a</p> <p>5 registration obligation.</p> <p>6 Q Okay. And then it was up to the sheriff's</p> <p>7 department to do the paperwork, and gather the</p> <p>8 information necessary for the person to comply</p> <p>9 with that registration requirement?</p> <p>10 A That is correct.</p> <p>11 Q Back in 2012, was there any expectation by the</p> <p>12 Indiana Department of Corrections that there</p> <p>13 would be any kind of independent investigation</p> <p>14 and evaluation, by the local sheriff's</p> <p>15 department, to confirm or verify that the</p> <p>16 individual was actually legally required to</p> <p>17 register as a sex offender?</p> <p>18 A Can you repeat that question?</p> <p>19 Q Sure. Was there an expectation on the Indiana</p> <p>20 Department of Corrections -- of the Indiana</p> <p>21 Department of Corrections, in 2012, that the</p> <p>22 local sheriff's department would be required to</p> <p>23 do some sort of independent investigation to</p> <p>24 verify that a particular inmate who had been --</p> <p>25 or a particular individual that had been</p>	<p style="text-align: right;">Page 40</p> <p>1 complied with the registration requirements?</p> <p>2 A No. The only confirmation we would have had,</p> <p>3 would have been to look in the actual offender</p> <p>4 watch application.</p> <p>5 Q Mr. Brown was incarcerated then after 2012, for</p> <p>6 a period of time, and released again in 2015.</p> <p>7 Did you find any particular paperwork related to</p> <p>8 his release from the Indiana Department of</p> <p>9 Corrections in 2015?</p> <p>10 A The information I reviewed I did not, but I</p> <p>11 don't -- if I remember correctly, he was</p> <p>12 actually released from DOC in 2012, and he was</p> <p>13 on parole from roughly 2012 to 2015, and I</p> <p>14 believe he was discharged at that time, if I</p> <p>15 remember correctly.</p> <p>16 (Deposition Exhibit F marked for</p> <p>17 identification.)</p> <p>18 Q Let me show you this, I guess. Let me show you</p> <p>19 what's marked as Exhibit F. This is a packet of</p> <p>20 documents from Noble County, so you may or may</p> <p>21 not have seen it before, but if you'd take a</p> <p>22 look at it.</p> <p>23 A (Witness complies.)</p> <p>24 Q Have you seen the documents -- this packet of</p> <p>25 documents as Exhibit F?</p>
<p style="text-align: right;">Page 39</p> <p>1 designated as someone who had to register as a</p> <p>2 sex offender, that that was actually true?</p> <p>3 A There wasn't an expectation but, at the same</p> <p>4 time, local sheriff's departments did do that.</p> <p>5 Q What do you mean?</p> <p>6 A There were local sheriff's department that took</p> <p>7 the information that was provided to them, and</p> <p>8 before they would actually register an</p> <p>9 individual, they would actually review all the</p> <p>10 documentation, collect their own individual</p> <p>11 documentation, and make decisions themselves.</p> <p>12 Q Okay. Was that something that the Indiana</p> <p>13 Department of Corrections expected each of the</p> <p>14 sheriff's department to do, or something that</p> <p>15 they just chose to do on their own, some of</p> <p>16 them?</p> <p>17 A We did not expect, they chose to do it on their</p> <p>18 own.</p> <p>19 Q All right. Once the individual then like</p> <p>20 Mr. Brown would come to the Noble County</p> <p>21 Sheriff's Department and they sign up all the</p> <p>22 paperwork for him at the sheriff's department,</p> <p>23 was there a procedure, back in 2012, where any</p> <p>24 of that paperwork would then come back to the</p> <p>25 Department of Correction showing that he</p>	<p style="text-align: right;">Page 41</p> <p>1 A Yes.</p> <p>2 Q And what is it?</p> <p>3 A This appears to be a registration form</p> <p>4 that -- my guess is that maybe Mr. Brown may</p> <p>5 have completed himself, or someone did on his</p> <p>6 behalf, at the local sheriff's department, in</p> <p>7 this case the Noble County Sheriff's Department.</p> <p>8 Q And it looks like on the last page it has a date</p> <p>9 of May the 20th of 2015, do you see that?</p> <p>10 A That is correct.</p> <p>11 Q And it says next registration date May 20th of</p> <p>12 2016. So is it your understanding that this</p> <p>13 form would just reflect that there's an annual</p> <p>14 reregistration requirement?</p> <p>15 A Based on that date, yes. There should be some</p> <p>16 other information in this document that would</p> <p>17 reflect that as well, but it appears he was told</p> <p>18 he needed to report within one year for his next</p> <p>19 registration date.</p> <p>20 Q I see. So as part of the sex registration</p> <p>21 requirements under the statute, you have -- if</p> <p>22 an inmate is subject to that particular</p> <p>23 registration requirement, it's -- an annual</p> <p>24 update kind of thing has to be done?</p> <p>25 A Yes. Individuals have a couple of different</p>

<p style="text-align: right;">Page 42</p> <p>1 models. You can be required to report every 90</p> <p>2 days, if you fall under certain statuses. In</p> <p>3 this particular case, he was required to report</p> <p>4 once per year to the local sheriff, and they</p> <p>5 would have had to validate his address once per</p> <p>6 year as well.</p> <p>7 (Deposition Exhibit G marked for</p> <p>8 identification.)</p> <p>9 Q Okay. Let me show you what's marked as</p> <p>10 Exhibit G. Now, this is a two-page document</p> <p>11 that actually came from the Noble County</p> <p>12 Sheriff's Department, but it references</p> <p>13 communications with the Indiana Department of</p> <p>14 Corrections. Do you know what this is?</p> <p>15 A Yes.</p> <p>16 Q What is this?</p> <p>17 A This is a communication between Laura</p> <p>18 Kloimwieder and Shawn Dunafin about Mr. Brown's</p> <p>19 registration obligations?</p> <p>20 Q Who is Laura?</p> <p>21 A Laura Kloimwieder was an individual that was on</p> <p>22 contract with the Department during this time up</p> <p>23 and through sometime, I believe, in 2016, and</p> <p>24 she would make registration determinations. She</p> <p>25 was actually a licensed attorney here in Indiana</p>	<p style="text-align: right;">Page 44</p> <p>1 (Deposition Exhibit H marked for</p> <p>2 identification.)</p> <p>3 Q This is Exhibit H. This also came from the</p> <p>4 Noble County Sheriff's Department as two pages.</p> <p>5 It's titled at the top, "Investigative Notes,</p> <p>6 report for Jeffrey Scott Brown." Have you seen</p> <p>7 this before?</p> <p>8 A I have.</p> <p>9 Q And this also apparently is from Laura?</p> <p>10 A There is an entry by Laura on here but the other</p> <p>11 entries are not by Laura, they're from either</p> <p>12 from the system or individuals.</p> <p>13 Q All right.</p> <p>14 A And if I could ask a clarification point?</p> <p>15 Q Yeah, I think -- it's the same page. It looks</p> <p>16 like I copied twice.</p> <p>17 A Okay, that answered my question.</p> <p>18 Q So it's really just the same -- Exhibit H is two</p> <p>19 pages of the same thing. My apologies. My</p> <p>20 secretary must have -- I will blame my secretary</p> <p>21 for that. She's not here to defend herself.</p> <p>22 So looking at the first of the same two</p> <p>23 pages, there's an investigative note dated March</p> <p>24 14 of 2016, from Laura, do you see that?</p> <p>25 A Yes.</p>
<p style="text-align: right;">Page 43</p> <p>1 as well.</p> <p>2 Q Did she work in your department?</p> <p>3 A She did.</p> <p>4 Q And this email exchange is dated, what, March</p> <p>5 the 3rd from -- March the 3rd, and March the</p> <p>6 8th, it looks like?</p> <p>7 A That is correct.</p> <p>8 Q Shawn Dunafin was an officer with the Noble</p> <p>9 County Sheriff's Department at that time; is</p> <p>10 that your understanding?</p> <p>11 A That is my understanding.</p> <p>12 Q And what information was Laura providing at that</p> <p>13 point to Officer Dunafin?</p> <p>14 A The Noble County Sheriff's Department had</p> <p>15 reached out to us and asked us to make a</p> <p>16 determination on Mr. Brown, and Laura happened</p> <p>17 to be that individual that made that</p> <p>18 determination.</p> <p>19 Q In this email exchange, it says that she's</p> <p>20 providing two notices, do you know what she's</p> <p>21 talking about?</p> <p>22 A Yes. Those are the two registration notices we</p> <p>23 discussed earlier.</p> <p>24 Q Okay. The one from 2009, and the one from 2012?</p> <p>25 A That is correct.</p>	<p style="text-align: right;">Page 45</p> <p>1 Q Is this something that just goes in your</p> <p>2 internal computer system?</p> <p>3 A No, this is actually a screen shot or a copy of</p> <p>4 a document from the offender watch application</p> <p>5 that's used for sex and violent offender</p> <p>6 registration.</p> <p>7 Q And what is that offender watch, what does --</p> <p>8 where does that go?</p> <p>9 A It's a shared system between DOC and local</p> <p>10 sheriffs. So this is just simply a document</p> <p>11 that is ordered -- better yet, it's a tracking</p> <p>12 listing that's connected to Mr. Brown.</p> <p>13 Q Okay. So if a local law enforcement agency</p> <p>14 would stop a particular individual, could they</p> <p>15 look this up and determine whether or not</p> <p>16 they're required to register?</p> <p>17 A It would depend on the department. Some</p> <p>18 departments may have access, they're -- street</p> <p>19 officers may have access to the registries,</p> <p>20 others likely do not.</p> <p>21 Q All right. So what is it that Laura is noting</p> <p>22 at the top of this Exhibit H?</p> <p>23 A She's noting that a review was completed, and it</p> <p>24 was found that the individual in this case,</p> <p>25 Jeffrey Brown, did not have an obligation to</p>

<p style="text-align: right;">Page 46</p> <p>1 register.</p> <p>2 Q Okay. Do you know why she conducted that review</p> <p>3 in March of 2016?</p> <p>4 A Yes. It's the previous exhibit, Shawn Dunafin</p> <p>5 had reached out to our office to request the</p> <p>6 review.</p> <p>7 Q And do you know on what basis she determined</p> <p>8 that Mr. Brown was not required to register as a</p> <p>9 sex offender?</p> <p>10 A Yes. His two crimes that could be sex or</p> <p>11 violent offender related, which were criminal</p> <p>12 confinement and sexual battery. Criminal</p> <p>13 confinement was committed against an adult, and</p> <p>14 sexual battery was also committed against an</p> <p>15 adult, and that offense was added to the</p> <p>16 registration listing after he committed that</p> <p>17 crime. So, therefore, it was not noticed.</p> <p>18 Q And does that go back to the court decision that</p> <p>19 we discussed previously?</p> <p>20 A It does.</p> <p>21 Q And you said at some point that the policy of</p> <p>22 the Department of Corrections changed in regard</p> <p>23 to whether or not the registration requirement</p> <p>24 would -- necessitated some kind of individual</p> <p>25 application to a court; do you remember that</p>	<p style="text-align: right;">Page 48</p> <p>1 obligation to register.</p> <p>2 Q Do you know when that changed, that policy</p> <p>3 changed?</p> <p>4 A I do not know.</p> <p>5 Q And when you say the department would start</p> <p>6 looking at individual offenders or inmates, did</p> <p>7 you have some sort of list of individuals that</p> <p>8 fall into that -- that had been a gray area that</p> <p>9 you looked at?</p> <p>10 A List of individuals? No.</p> <p>11 Q So how was it that you looked at it, your</p> <p>12 department looked at it, to see whether or not</p> <p>13 someone who had previously been notified they</p> <p>14 had to register as a sex offender, that they no</p> <p>15 longer had to do so?</p> <p>16 A When either an individual was getting out of the</p> <p>17 Department of Correction, or if a request came</p> <p>18 to us, or if there happened to be litigation, so</p> <p>19 we would look -- and probably examples as well,</p> <p>20 but we would look at cases and individuals at</p> <p>21 that time, and we would make a determination</p> <p>22 based on our understanding at that point; when</p> <p>23 the individual committed their crime, what case</p> <p>24 law was in place at that time, what Indiana code</p> <p>25 was in place, and we would make that decision.</p>
<p style="text-align: right;">Page 47</p> <p>1 discussion we had?</p> <p>2 A Yes.</p> <p>3 Q And can you explain what changed, how the policy</p> <p>4 changed, and we'll talk about when?</p> <p>5 A Sure. So when the case Wallace v. State</p> <p>6 initially came down, there was a lot of</p> <p>7 confusion on how to implement that decision, and</p> <p>8 we were provided advice that it was an "as</p> <p>9 applied decision," and so it applied to Richard</p> <p>10 Wallace at that time.</p> <p>11 We were advised by the AG's office that</p> <p>12 when we were making our determinations, that</p> <p>13 offenders actually had to go back to court and</p> <p>14 get an order specific to them to be removed from</p> <p>15 the registry.</p> <p>16 At some later point, and I don't have</p> <p>17 specific dates, we actually changed that</p> <p>18 process, based on some advice from our own</p> <p>19 internal counsel, and we started proactively</p> <p>20 looking at individuals to see when their crimes</p> <p>21 were committed and whether or not they were on</p> <p>22 notice for those crimes.</p> <p>23 And as a result of that, we would</p> <p>24 proactively indicate either they didn't have an</p> <p>25 obligation to register or they no longer had an</p>	<p style="text-align: right;">Page 49</p> <p>1 Q Prior to March of 2016, did the Department of</p> <p>2 Corrections have some sort of database in its</p> <p>3 system that actually listed each person who was</p> <p>4 subject to the sex registration requirements?</p> <p>5 A Yes.</p> <p>6 Q And then was that broken down in a way that you</p> <p>7 could look at that database and determine</p> <p>8 whether or not the requirement for registration</p> <p>9 was based upon convictions that occurred before</p> <p>10 the law was changed?</p> <p>11 A No.</p> <p>12 Q So in order to do that, you had to go back into</p> <p>13 the record of each individual inmate?</p> <p>14 A Absolutely.</p> <p>15 Q And as I understand your testimony, that was</p> <p>16 only done when inmates were then being released</p> <p>17 at a particular time from prison; right?</p> <p>18 A That is part of it.</p> <p>19 Q Or if someone requested that there be an</p> <p>20 investigation; correct?</p> <p>21 A Yes.</p> <p>22 Q Or if some litigation prompted it?</p> <p>23 A Yes.</p> <p>24 Q Any other reasons there would be some</p> <p>25 investigation to determine whether the</p>

<p style="text-align: right;">Page 50</p> <p>1 registration requirements were -- should be in</p> <p>2 place?</p> <p>3 A Outside of those three, it could have just</p> <p>4 simply been that we just stumbled across the</p> <p>5 record, and conducted a review ourselves.</p> <p>6 Q All right.</p> <p>7 (Deposition Exhibit I marked for</p> <p>8 identification.)</p> <p>9 Q If you look at Exhibit I. Have you seen this</p> <p>10 document before?</p> <p>11 A I do not believe so.</p> <p>12 Q It appears simply to be a notification from</p> <p>13 Wanda Truelove, who works and worked for the</p> <p>14 Noble County Sheriff's Department, to Mr. Brown,</p> <p>15 that he had been removed from the registration</p> <p>16 requirements pursuant to the determination of</p> <p>17 the Indiana Department of Corrections, do you</p> <p>18 see that?</p> <p>19 A Yes.</p> <p>20 Q Okay. So is it your understanding, Brent, that</p> <p>21 the reason that the determination -- the reason</p> <p>22 that there wasn't a prior determination before</p> <p>23 March of 2016, that -- of whether or not</p> <p>24 Mr. Brown was required to register as a sex</p> <p>25 offender, was simply because he didn't fall into</p>	<p style="text-align: right;">Page 52</p> <p>1 believed should be applied to him?</p> <p>2 A Yes.</p> <p>3 Q And from 2012 until 2016, the only reason he</p> <p>4 continued to remain under the registration</p> <p>5 requirements was because his case never came up</p> <p>6 for review; is that fair?</p> <p>7 A Correct.</p> <p>8 Q Okay. And before March of 2016, the Indiana</p> <p>9 Department of Corrections never notified anyone</p> <p>10 with the Noble County Sheriff's Department that</p> <p>11 those registration requirements no longer</p> <p>12 applied to Mr. Brown?</p> <p>13 A Not to my understanding.</p> <p>14 MR. KEEN: Brent, those are all the</p> <p>15 questions I have for you today. Thank you so</p> <p>16 much.</p> <p>17 MR. FINDLEY: Chris, you want to go next?</p> <p>18 MR. MYERS: Yeah, I have a couple of</p> <p>19 questions.</p> <p>20</p> <p>21 CROSS-EXAMINATION,</p> <p>22 QUESTIONS BY MR. CHRISTOPHER C. MYERS:</p> <p>23 Q So, Mr. Myers, did you ever make a determination</p> <p>24 that the state or the IDOC's belief that</p> <p>25 Mr. Brown had to register -- did you ever make</p>
<p style="text-align: right;">Page 51</p> <p>1 one of those three categories you just</p> <p>2 described?</p> <p>3 A Yes. We were, in addition, given advice that we</p> <p>4 didn't have to go back and look at all the</p> <p>5 individuals that potentially could fall under a</p> <p>6 previous court decision, and so we did it going</p> <p>7 forward when individuals either brought the</p> <p>8 issue to us, or there was litigation, or it</p> <p>9 would be a new release, something to indicate</p> <p>10 that a review should be done.</p> <p>11 Q That was other legal advice you're describing</p> <p>12 that you received?</p> <p>13 A Yes.</p> <p>14 Q So based upon your review of Jeffrey Brown's</p> <p>15 individual case, and the decisions that were</p> <p>16 made in 2009 and 2012, that he had to register</p> <p>17 as a sex offender, that those determinations in</p> <p>18 2009 and 2012 were correct in keeping with what</p> <p>19 was then the policy that the Indiana Department</p> <p>20 of Corrections had in place?</p> <p>21 A Correct.</p> <p>22 Q So it wasn't as if it was a mistake of the</p> <p>23 procedures, or the application of the procedures</p> <p>24 on those two dates, those were proper</p> <p>25 determinations as far as your department</p>	<p style="text-align: right;">Page 53</p> <p>1 the determination that that belief was improper?</p> <p>2 A I don't think I understand what you mean by</p> <p>3 improper.</p> <p>4 Q Improper in this context would mean that the</p> <p>5 state's belief, at least in the end, was</p> <p>6 determined to be a wrong belief, that is that</p> <p>7 even back in 2012, Mr. Brown should not have had</p> <p>8 to register as a sex offender for life?</p> <p>9 A Based on the advice we received, no. I still</p> <p>10 believe that's correct.</p> <p>11 Q So you think that he correctly had to register</p> <p>12 back in 2012?</p> <p>13 A Based on the advice that we received from</p> <p>14 counsel, that was our approach. And at this</p> <p>15 point I don't see why there would be any</p> <p>16 difference to that. Certainly, Wallace v. State</p> <p>17 came down before that date, but the advice we</p> <p>18 received was it was an "as applied decision,"</p> <p>19 and I don't think that has changed.</p> <p>20 Q Okay. So I think you've answered my question,</p> <p>21 that is that the Wallace v. State decision was</p> <p>22 made prior to 2012; correct?</p> <p>23 A That is correct.</p> <p>24 Q All right. And so the law was out there,</p> <p>25 depending upon how you wanted to review it and</p>

<p style="text-align: right;">Page 54</p> <p>1 apply it. In the end, it was the Wallace v. 2 State decision, as applied to Mr. Brown, 3 basically caused the state to believe that he 4 did not have to register as a sex offender; 5 correct? 6 A We certainly made the decision with that case in 7 mind. But ultimately, the decision resulted 8 from new legal advice to us, that we should 9 proactively review cases, and it's all tied in 10 with another case called Shepherd v. IDOC, where 11 we created an administrative review process. 12 So as a result of the administrative review 13 process, Wallace, and new advice, at some point, 14 you know, in that period of time, we received 15 advice to proactively go ahead and remove 16 individuals and not wait for a court order to do 17 that. 18 MR. MYERS: I have no further questions. 19 20 CROSS-EXAMINATION, 21 QUESTIONS BY MR. ADAM G. FORREST: 22 Q My name is Adam Forrest. I represent 23 April Wilburn in these proceedings. Based on 24 the information that you just provided to us 25 about the IDOC's position as to how Wallace</p>	<p style="text-align: right;">Page 56</p> <p>1 STATE OF INDIANA)) SS: 2 COUNTY OF HENDRICKS) 3 I, Rhonda J. Hobbs, RPR, a Notary 4 Public in and for the County of Hendricks, State 5 of Indiana at large, do hereby certify that 6 BRENT MYERS, the deponent herein, was by me 7 first duly sworn to tell the truth, the whole 8 truth, and nothing but the truth in the 9 aforementioned matter; 10 That the foregoing deposition was 11 taken on behalf of the Defendants, at the 12 offices of Office of the Attorney General, 13 Government Center South - 5th Floor, 302 West 14 Washington Street, Indianapolis, Marion County, 15 Indiana, on the 16th day of December, 2019, 16 commencing at the hour of 10:01 a.m., pursuant 17 to the Indiana Rules of Trial Procedure; 18 That said deposition was taken down 19 stenographically and transcribed under my 20 direction, and that the typewritten transcript 21 is a true record of the testimony given by the 22 said deponent; and thereafter presented to said 23 deponent for his/her signature; 24 That the parties were represented by 25 their counsel as aforementioned.</p>
<p style="text-align: right;">Page 55</p> <p>1 applied to offenders like Mr. Brown, do you 2 think Ms. Wilburn had any authority to act in a 3 manner other than she did, as evidenced by these 4 documents? 5 A I think what she did was consistent with the 6 Department of Corrections' approach at that 7 time. 8 MR. FORREST: Thank you, that's the only 9 question I have. Bob? 10 MR. MYERS: Nothing further from me. 11 MR. FINDLEY: I'm good. 12 MR. KEEN: Chris, anything else? 13 MR. MYERS: Nothing. 14 MR. KEEN: I think we're done. I will make 15 sure you have a copy of the exhibits in a couple 16 days when I get back in the office. 17 MR. MYERS: Thank you. 18 MR. KEEN: Thanks so much, I'm going to 19 hang up then. 20 (Time Noted 11:03 a.m.) 21 AND FURTHER THE DEPONENT SAITH NOT. 22 23 24 25 <p style="text-align: center;">BRENT MYERS</p></p>	<p style="text-align: right;">Page 57</p> <p>1 I do further certify that I am a 2 disinterested person in this cause of action; 3 that I am not a relative or attorney of either 4 party, or otherwise interested in the event of 5 this action, and am not in the employ of the 6 attorneys for any party. 7 IN WITNESS WHEREOF, I have hereunto 8 set my hand and affixed my notarial seal this 9 9th day of January, 2020. 10 11  12 NOTARY PUBLIC 13 14 15 My Commission Expires: August 24, 2025 16 County of Residence: Hendricks 17 18 19 20 21 22 23 24 25</p>

<p style="text-align: right;">Page 58</p> <p>1 Bryan R. Findley, Esq. 2 bryan.findley@atg.in.gov 3 January 9, 2020 4 RE: Brown, Jeffrey v. Hartman, Kyle et al. 5 12/16/2019, Brent Myers (#3610902) 6 The above-referenced transcript is available for 7 review. 8 Within the applicable timeframe, the witness should 9 read the testimony to verify its accuracy. If there are 10 any changes, the witness should note those with the 11 reason, on the attached Errata Sheet. 12 The witness should sign the Acknowledgment of 13 Deponent and Errata and return to the deposing attorney. 14 Copies should be sent to all counsel, and to Veritext at 15 erratas-cs@veritext.com 16 17 Return completed errata within 30 days from 18 receipt of testimony. 19 If the witness fails to do so within the time 20 allotted, the transcript may be used as if signed. 21 22 Yours, 23 Veritext Legal Solutions 24 25</p>	<p style="text-align: right;">Page 60</p> <p>1 Brown, Jeffrey v. Hartman, Kyle et al. 2 Brent Myers (#3610902) 3 ACKNOWLEDGEMENT OF DEPONENT 4 I, Brent Myers, do hereby declare that I 5 have read the foregoing transcript, I have made any 6 corrections, additions, or changes I deemed necessary as 7 noted above to be appended hereto, and that the same is 8 a true, correct and complete transcript of the testimony 9 given by me. 10 11 _____ 12 Brent Myers Date 13 *If notary is required 14 SUBSCRIBED AND SWORN TO BEFORE ME THIS 15 _____ DAY OF _____, 20____. 16 17 18 _____ 19 NOTARY PUBLIC 20 21 22 23 24 25</p>
<p style="text-align: right;">Page 59</p> <p>1 Brown, Jeffrey v. Hartman, Kyle et al. 2 Brent Myers (#3610902) 3 E R R A T A S H E E T 4 PAGE _____ LINE _____ CHANGE _____ 5 _____ 6 REASON _____ 7 PAGE _____ LINE _____ CHANGE _____ 8 _____ 9 REASON _____ 10 PAGE _____ LINE _____ CHANGE _____ 11 _____ 12 REASON _____ 13 PAGE _____ LINE _____ CHANGE _____ 14 _____ 15 REASON _____ 16 PAGE _____ LINE _____ CHANGE _____ 17 _____ 18 REASON _____ 19 PAGE _____ LINE _____ CHANGE _____ 20 _____ 21 REASON _____ 22 _____ 23 _____ 24 Brent Myers Date 25</p>	



RELEASE AUTHORIZATION
State Form

Indiana Department of Correction
Sentence Computation and Release


Offender Name JEFFREY S. BROWN	DOC # #956175	EP#D *9-8-2012	Facility *NCF
Name of Authorizing Release Specialist TONYA WOIDA, RELEASE SPECIALIST 3		Date Final Review Completed * 9-6-2012	
Comments * LIFETIME REVISORY			
Parole District (If Applicable) *PD2	County of Probation (If Applicable) *N/A	CIF (If Applicable) *N/A	YOT Authority (If Applicable) *N/A
Actual date the Offender is Released from the Facility *9-6-2012			
Signature 			Date Authorized * 9-6-2012

Exhibit No.: E
Deponent: Bm
Date/RPR: 12-16-14
CONNOR REPORTING



RELEASE CHECKLIST

Indiana Department of Correction

OFFENDER NAME	Brown, Jeffrey	DOC#	956175	EPRD	9/8/12
TYPE OF RELEASE	<input checked="" type="checkbox"/> Parole <input type="checkbox"/> Probation <input type="checkbox"/> Dual Supervision <input type="checkbox"/> Discharge <input type="checkbox"/> CTP				
PAROLE PLACEMENT APPROVED	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A DATE: 7-19-12				
PAROLE DISTRICT (If Applicable)	<input type="checkbox"/> N/A <input checked="" type="checkbox"/> PAROLE DISTRICT: PD#2				
REPORTING INSTRUCTIONS	<input checked="" type="checkbox"/> COMPLETED <input type="checkbox"/> NOT COMPLETED				
PROBATION PLACEMENT ENTERED	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A				
PROBATION COUNTY (If Applicable)	<input checked="" type="checkbox"/> N/A <input type="checkbox"/> COUNTY OF SUPERVISION:				
TOT WANTING AUTHORITY	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO IF YES, NAME OF AUTHORITY:				
FINAL DISCHARGE COMPLETED	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO				
V/N NOTIFICATIONS COMPLETE	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A				
SEX OFFENDER	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO				
VIOLENT OFFENDER	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO				
SEX/VIOLENT OFFENDER PAPERS	<input checked="" type="checkbox"/> COMPLETED <input type="checkbox"/> NOT COMPLETED <input type="checkbox"/> N/A				
IN REGISTRY (If Sex/Violent Offender)	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A				
IDACS CHECK COMPLETED BY	Print Name of Person Completing IDACS Check Heady				
RESULTS OF IDACS CHECK	<input checked="" type="checkbox"/> CLEAR <input type="checkbox"/> NOT CLEAR				
RESOLUTION OF IDACS HITS	N/A				
WARRANTS/DETAINERS	<input checked="" type="checkbox"/> RESOLVED <input type="checkbox"/> NOT RESOLVED				
LIST ANY UNRESOLVED WARRANTS/DETAINERS	N/A				
ADDITIONAL COMMENTS					

APPROVAL

Signature of Superintendent/Designee	Date
<i>S. Young</i>	9/15/12
Signature of Master Lockup Officer	Date
<i>April Wilburin</i>	9-5-12

New Castle Correctional Facility

Memorandum

To: IDAC's

From: S. Young

Date: 8/30/2012

RE: IDAC's Check

PLEASE COMPLETE THIS FORM AND RETURN AS SOON AS POSSIBLE.

Offender Name: BROWN, JEFFREY

DOC#: 956175

PRD: 09082012

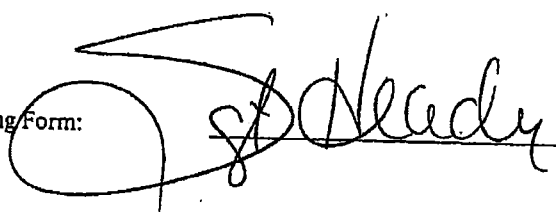
DOB: 04101964

SSN: _____

WARRANTS/DETAINERS/IDAC'S REVIEWED/CLEARED:

	CLEAR	NOT CLEAR
IDAC'S Reviewed		
IDAC'S Clear	✓	

IDAC's Staff Completing Form:



Date: 8/30/12

• **FORT WAYNE PAROLE DISTRICT**
(PD#2)

BROWN, Jeffrey 956175

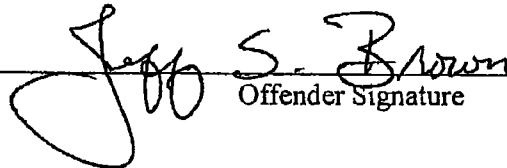
ADDRESS:

Robert Brown
1241 E. Hwy 6
Brimfield, IN 46794

REPORTING INSTRUCTIONS:

Within 24hrs of release subject is to contact SPA HARTMAN at 260-341-9978 (cell).

Fort Wayne Parole Office #2
3111 Coliseum Blvd
Fort Wayne, IN 46805
260-484-3048


Offender Signature

9-5-12
Date

Central Office
Parole Office
Packet
Offender



CONDITIONAL PAROLE RELEASE AGREEMENT

State Form 23R

CONDITIONAL PAROLE REGULATIONS

I do hereby agree to abide by the following terms and conditions of parole as established by the Department of Correction and promulgated by the Indiana Parole Board pursuant to IC 11-9-1-2; IC 11-13-3-4; IC 35-50-6-1.

- INITIAL REPORTING** - Upon my release from the institution I agree to proceed directly to the program approved by the division of parole and report to my assigned supervising officer in accordance with the written instructions provided for me at the time of my release.
- EMPLOYMENT AND RESIDENCE** - I will make every effort to remain gainfully employed and I understand that I must obtain written permission from my supervising officer prior to changing my employment or residence.
- TRAVEL** - a) I understand that out-of-state travel will require written permission from the Division of Parole and be in accordance with the provisions of the Interstate Compact Agreement. Permission for such travel may be obtained after consultation with and receiving written permission from my supervising officer.
b) I agree to consult with my supervising officer if personal needs or employment require frequent or prolonged periods beyond the parole district or area to which I am released.
- OWNING, LEASING, AND OPERATING MOTOR VEHICLES**
a) I will obtain from my supervising officer written permission from the Division before applying for or renewing a license to operate a motor vehicle.
b) I agree to consult with my supervising officer and receive his written permission prior to purchasing or leasing a motor vehicle. Permission to own, lease, or operate a motor vehicle is granted with the understanding that I shall comply with all state laws, local ordinances, and regulations of the Bureau of Motor Vehicles pertaining to ownership, financial responsibility, and the operation of motor vehicles.
- ABUSE OF ALCOHOL OR CONTROLLED SUBSTANCE** - I understand that the following is a violation of my parole:
a) Being intoxicated, or
b) Using, possessing, or trafficking illegally in a controlled substance. Abuse of alcohol or drugs is not a defense for violation of the parole release agreement.
- VISITING JAILS OR CORRECTIONAL INSTITUTIONS** - Visiting jails, city lock-ups, or state or federal correctional facilities is permitted only after first obtaining written permission of the parolee's supervising officer and of the chief administrative officer of the jail, city lock-up, or state or federal correctional facility to be visited. Such visits shall be limited to visiting those who are blood relatives or spouses, unless the supervising officer determines otherwise on a showing by me of a compelling reason.
- CRIMINAL CONDUCT** - I will not engage in conduct prohibited by federal or state law or local ordinance.
- FIREARMS AND DANGEROUS WEAPONS** - I understand that carrying, dealing in, or possessing firearms, explosive devices or deadly weapons is a violation of my parole release agreement.
- HOME VISITATION AND SEARCH**
a) I will allow my supervising officer or other authorized officials of the Department of Correction to visit my residence and place of employment at any reasonable time.
b) I understand that I am legally in the custody of the Department of Correction and that my person and residence or property under my control may be subject to reasonable search by my supervising officer or authorized official of the Department of Correction if the officer or official has reasonable cause to believe that the parolee is violating or is in imminent danger of violating a condition to remaining on parole.
- COMMUNICATION AND SPECIAL INSTRUCTIONS** - I agree to report to my supervising officer as instructed and to respond to any and all communications from any authorized employee of the Department of Correction. I will abide by any special conditions imposed by the Indiana Parole Board which have been reduced to writing and included as a condition of my parole.

SPECIAL CONDITIONS

I understand that any acts of omissions in violation of the terms and conditions of my parole will subject me to being taken into immediate custody by the Indiana Parole Board and initiation of proceedings for revocation of my parole.

I hereby certify that the above statement of parole rules, regulations and conditions of parole has been read and explained to me by the following institutional Agent or Parole Officer, April Wilburn, and I agree and consent to these rules and regulations as evidenced by my signature this 5 day of September, 20 12.

CONDITIONAL PAROLE AUTHORIZATION		
Name <u>Brown, Jeffrey</u>	Number <u>956175</u>	Institution <u>NC6</u>
Witnessed: Institutional Agent or Parole Officer <u>April Wilburn</u>	Signature of Offender <u>Jeff Brown</u>	
Released by Parole Board pursuant to IC 11-13-3-3; IC 35-50-6-1 per		
Chairman's Signature	Date Signed	Release Date
Released Per IC 35-50-6-1		
Institutional Agent <u>April Wilburn</u>	Date Signed <u>9-5-12</u>	Maximum Expiration of Sentence Date <u>8-28-16</u>

DISTRIBUTION: White - Institution, Canary - Central Office, Pink - Parole Officer, Goldenrod - Parolee



The GEO Group, Inc.
New Castle Correctional Facility
1000 Van Nuys Rd, P.O. Box E
New Castle, IN 47362
Main Tel: 765 593 0111
Main Fax: 765-593-6770
www.thegeogroupinc.com

NAME: BROWN, Jeffrey
DOC#: 956175
CAUSE#: 57C01 9405 CF 022

On July 26, 1995, you were sentenced by the Noble County Circuit Court on the above cause number. You were sentenced to 6 years with 3 years suspended. You will be supervised by the Noble County Probation Department.

You are to report, in person, the next working day, to the Noble County Probation Department after your release from the New Castle Correctional Facility. Your release date from the New Castle Correctional Facility is Thursday, Sept 6, 2012.

Stacey Beam
Chief Probation Officer
Noble County Probation
101 North Orange, Street, Room 100
Albion, IN 46701-1049
260-636-3116

Sincerely,

M. Zenk, Superintendent
New Castle GEO Correctional Facility

I acknowledge receipt of this letter and understand these reporting instructions.


Offender's Signature

9-5-12
Date


Witnessed by:

cc: Chief Probation Officer
Central Office
Packet
Offender

Notification of Sex and Violent Offender Registration Responsibilities and Other Duties

State Form 46656 (R11 / 7-08)

*This agency is requesting the disclosure of your Social Security Number in accordance with IC 11-8-8. Disclosure is mandatory; this record cannot be processed without it.

Full Name of Offender (first, middle, last, and suffix)

Jeffrey S. Brown

Please check one item in each row

A	Is the offender required to register under IC 11-8-8?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
B	Is the offender a sexually violent predator under IC 35-38-1-7.5	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
C	Is the offender an offender against children under IC 35-42-4-11?	Yes <input type="checkbox"/>	No <input type="checkbox"/> NA <input type="checkbox"/>
D	How long is the offender required to register under IC 11-8-8?	10 Years <input type="checkbox"/>	Life <input checked="" type="checkbox"/> Other <input type="checkbox"/>

DOC Number (if applicable)

956175

Did the offender successfully complete the Indiana Department of Correction's Sex and Violent Offender Registration Course?

Yes ☐

Enter Date Completed

Social Security Number

Date of Birth

4/10/64

FBI Number

920 119 PA6

Cause #

43 Doc 9608 CF 227

IC Code (or out-of-state code)

35-42-4-8

Felony Level

F066

Current Status

Parole ☒

Probation ☒

CC/CTP ☐

Discharged ☐

Other ☐

Release Date (walkout date)

9/6/12

Next Registration Date

72 Hours

Registered Address

Residence Robert Brown	Street Address 1241 E. Hwy 6	City Brimfield	State IN	Zip Code 46794
Work	Street Address	City	State	Zip Code
School	Street Address	City	State	Zip Code

I have read or have had read to me the information contained in "Sex and Violent Offender Registration Responsibilities and Other Duties". By my signature, I acknowledge that I have received a copy of this information and that I understand my registration duties and obligations under IC 11-8-8, IC 35-42-4, and other corresponding Indiana Statutes.

Signature of offender

[Signature]

Printed name of offender

DOC number

Date (month, day, year)

I hereby certify that the above offender was orally informed and provided a copy of the information contained in "Sex and Violent Offender Registration Responsibilities and Other Duties".

Signature of witness

[Signature]

Printed name of witness

April Wilburn

Title

Re-entry Spec

Date (month, day, year)

9-5-12



PAROLE STIPULATIONS FOR SEX OFFENDERS

State Form 48108 (R / 7-07)
INDIANA PAROLE BOARD

Name of offender Brown, Jeffrey	Department of Correction number 956175 NCF
DEFINITIONS: <ul style="list-style-type: none"> • Child or children is / are any person or persons under the age of eighteen (18) years. • Contact means face-to-face, telephonic, correspondence, computer, or indirect contact via third parties. 	
STIPULATIONS	OFFENDER INITIALS
1. You shall enroll in, actively participate in and successfully complete an approved sex offender treatment program. You must maintain steady progress toward all treatment goals and may not change treatment providers without prior approval of your parole agent. Prompt payment of any fees is your responsibility.	JB
2. You shall sign any waiver of confidentiality, release of information, or any other documents required to permit your parole agent and/or behavioral management or treatment providers to examine any and all records, to collaboratively share and discuss your behavioral management conditions, treatment progress, and parole stipulation needs as a team. This permission may extend to: (1) sharing your relapse prevention plan and treatment progress with your significant others and/or your victim and victim's therapist as directed by your parole agent or treatment provider(s), and (2) sharing of your modus operandi behaviors with law enforcement personnel.	JB
3. You shall be required to inform all persons living at the same residence of current and previous sex related convictions prior to establishing residency, as verified by your parole agent. You shall notify your parole agent of any change in home situations or marital status within twenty-four (24) hours. You shall have only one residence and one mailing address at a time.	JB
4. You shall not touch, photograph (still or moving), correspond with (via letter or e-mail), and/or engage in "small talk" or unnecessary conversation with any child, including your own, either directly or via third party, or attempt to do any of the preceding without written approval in advance by your parole agent in consultation with your treatment provider. You must never be in any vehicle or any residence with any child, including your own, even if other adult(s) is/are present, without written approval in advance by your parole agent in consultation with your treatment provider. You must report any inadvertent contact with children to your parole agent within twenty-four (24) hours of contact.	JB
5. You must not reside, visit or be within one thousand (1,000) feet of public parks with playgrounds, pools, rides, and/or nature trails; schools, day care centers, public swimming pools, public beaches, theaters, or any other place where children can reasonably be expected to congregate.	JB
6. You shall have no contact with your victim or victim's family, unless prior approval is granted by your parole agent and treatment provider, and only under special supervised conditions.	JB
7. You shall comply with any medical or mental health treatment or assessment, and any other behavioral management stipulations as required by your parole agent. You will only participate in behavioral management programs approved by your parole agent. You will not miss any appointments for psychotherapy, counseling, or community service obligations without the prior approval of your parole agent or treatment providers. You will not discontinue taking any prescribed medication without the approval of your prescribing physician and you must notify your parole agent and treatment provider within three (3) working days of discontinuing the medication.	JB
8. You shall not possess or view any material that is obscene, which for the purposes of this stipulation, is what the average person, applying contemporary community standards, finds that the dominant theme of the material, taken as a whole, appeals to a morbid, degrading, and unhealthy interest in sex; depicts or describes, in a patently offensive way, sexual conduct; and taken as a whole, lacks serious literary, artistic, political, or scientific value. You shall not visit strip joints, adult bookstores, peep shows, bars where topless or exotic dancers perform, or businesses which sell sexual devices or aids. You shall not possess personal contact materials (for example, magazines, or papers) that contain information about persons who are desiring to have personal relationships of any kind with others, nor will you place any ads that are sexual in content or respond by computer, telephone, or internet web sites, to any sexually solicitous ads.	JB

STIPULATIONS (continued)	OFFENDER INITIALS
9. You shall not use any computer with access to any "online computer service" at any location (including place of employment) without the prior approval of your parole agent. This includes any internet service provider, bulletin board system, e-mail system or any other public or private computer network.	JB
10. You shall allow your parole agent and/or computer service representative to conduct periodic, unannounced examination of your computer(s) equipment which may include retrieval and copying of all files from your computer(s) and any internal or external peripherals to ensure compliance with your stipulations. This may require removal of such equipment for the purpose of conducting a more thorough inspection. Your parole agent may have installed on your computer(s), at your expense, any hardware or software systems to monitor your computer usage.	JB
11. You shall not possess or use alcohol or any illegal controlled substance at any time.	JB
12. You shall not frequent or be present at any establishment whose main business purpose is the selling, distribution, serving or drinking of alcoholic beverages or illegal controlled substances.	JB
13. You shall submit to a substance abuse evaluation and follow all recommendations.	JB
14. You shall submit to breath (e.g. alco-sensor), urine, blood, saliva and/or DNA testing as ordered by your parole agent.	JB
15. You shall refrain from "cruising" activity, frequenting areas where potential victims can be encountered.	JB
16. You shall not hitchhike or pick up hitchhikers. You shall not travel alone (including but not limited to; driving, walking, bicycling, etc.) after dark.	JB
17. You shall not stay overnight with any adult and/or establish an intimate and/or sexual relationship with any adult without prior approval by your parole agent and treatment clinician. You must also report whether the person you are having a relationship with has children under the age of eighteen (18) and/or if children under the age of eighteen (18) reside in the person's home.	JB
18. You shall not use your employment as a means to acquire new victims. Your parole agency may contact your employer at any time. You will not work in certain occupations that involve being in the private residences of others, such as, but not limited to: door-to-door sales, soliciting, or delivery. Your parole agent must first approve any employment that you do engage in.	JB
19. You shall not possess any items on your person, in your vehicle, in your place of residence, or as a part of your personal effects which attract children or that may be used to coerce children to engage in inappropriate or illegal sexual activities. You will not attempt to persuade, whether by words or actions or both, a child to enter a vehicle, structure, or enclosed area, or to otherwise relocate.	JB
20. You shall not join or be associated with any group which promotes activities involving children under eighteen (18) years of age, such as, but not limited to: church or religious youth groups, Boy Scouts, Girl Scouts, Cub Scouts, Brownies, YMCA, YWCA, youth sports teams, public parks, etc.	JB
21. You shall actively participate in offense specific mental health treatment program(s) approved and ordered by your parole agent at your own expense. You will contact the approved/designated provider within seven (7) days of release to parole to schedule an appointment unless an appointment was already scheduled prior to release on parole. Treatment is considered a behavioral management requirement of your parole and may include plethysmograph or polygraph testing or similar assessment/management tools. Termination from treatment or non-compliance with other required behavioral management requirements will be considered a violation of your parole release agreement. Subsequent treatment referrals, if any, will be at the direction of your parole agent. Should you request and be permitted to change treatment providers, stricter stipulations may be applied.	JB
22. You shall participate in and complete periodic polygraph testing at the direction of your parole agent or any other behavioral management professionals who are providing treatment of assisting your parole agent in monitoring your compliance with your parole rules and special stipulations.	JB

STIPULATIONS (continued)		OFFENDER INITIALS
23. You shall be under intensive supervision for ninety (90) days and shall report to your parole agent on a weekly basis (or as frequently as instructed by your parole agent). Thereafter, you shall report as frequently as instructed.		JB
24. You shall register with local law enforcement authorities as a sex offender within seventy-two (72) hours of being released to parole supervision, or as instructed by your parole agent.		JB
25. You shall agree to permit the installation, maintenance and operation of any electronic monitoring equipment in both your home and on your body.		JB
The following additional and specific stipulations are also in effect and apply to your parole:		JB
26.		
27.		
28.		
I HEREBY IMPOSE THE FOLLOWING STIPULATIONS LISTED ABOVE: NI 1-25		
Signature of member of the Indiana Parole Board		Date (month, day, year)
Valerie J. Ashby, M.A., LAFET, LCSW		July 23, 2012
I HAVE READ OR HAVE HAD READ TO ME THE ABOVE PAROLE STIPULATIONS AND AGREE TO ABIDE BY THEM CONSISTENTLY AND WITHOUT EXCEPTION. I UNDERSTAND THAT IF I REFUSE TO SIGN AT THE SPACE PROVIDED BELOW, THE STIPULATIONS ABOVE WOULD STILL APPLY TO MY PAROLE.		
Signature of offender		Date (month, day, year)
Joe Brown		9-5-12
Signature of witness		Date (month, day, year)
April Wilburn		9-5-12
WAIVER OF EXTRADITION: I hereby waive extradition to the state of Indiana from any jurisdiction in or outside the United States where I may be found and I also agree that I will not contest any effort to return me to the state of Indiana.		
Signature of offender		Date (month, day, year)
Joe Brown		9-5-12
Signature of witness		Date (month, day, year)
April Wilburn		9-5-12

DISTRIBUTION: Facility Packet, Central Office Packet, District Parole Packet, Parolee

State of Indiana
Sex or Violent Offender Registration Form
Revision 1 / June 2010

IC 11-8-8-8

Required registration information

Sec. 8. The registration required under this chapter must include the following information:

- (1) The sex or violent offender's full name, alias, any name by which the sex or violent offender was previously known, date of birth, sex, race, height, weight, hair color, eye color, any scars, marks, or tattoos, Social Security number, driver's license number or state identification card number, vehicle description and vehicle plate number for any vehicle the sex or violent offender owns or operates on a regular basis, principal residence address, other address where the sex or violent offender spends more than seven (7) nights in a fourteen (14) day period, and mailing address, if different from the sex or violent offender's principal residence address.
- (2) A description of the offense for which the sex or violent offender was convicted, the date of conviction, the county of the conviction, the cause number of the conviction, and the sentence imposed, if applicable.
- (3) If the person is required to register under section 7(a) (2) or 7(a) (3) of this chapter, the name and address of each of the sex or violent offender's employers in Indiana, the name and address of each campus or location where the sex or violent offender is enrolled in school in Indiana, and the address where the sex or violent offender stays or intends to stay while in Indiana.
- (4) A recent photograph of the sex or violent offender.
- (5) If the sex or violent offender is a sexually violent predator, that the sex or violent offender is a sexually violent predator.
- (6) If the sex or violent offender is required to register for life, that the sex or violent offender is required to register for life.
- (7) Any electronic mail address, instant messaging username, electronic chat room username, or social networking web site username that the sex or violent offender uses or intends to use.
- (8) Any other information required by the department.

I have read or had read to me the above information. By my signature, I indicate that I have received a copy of this information and that I understand my duties and obligations to register for a period of:

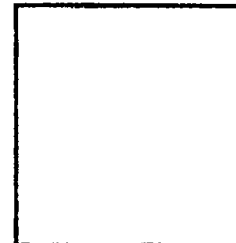
(10) (15) (25) years / <u>life</u>	(OFFICE USE ONLY)	Date Registration Expires: <u>NONE</u>
I understand that I have been designated as: (circle appropriate designation or cross-out if N/A)		
<u>Sexually Violent Predator</u>		<u>Offender Against Children</u>
(Offender initials):		(Offender initials)
<u>Violent Offender</u>		<u>Internet Restrictions IC 35-42-4-12</u>
(Offender initials)		(Offender initials)

Jeff Brown Jeff Brown 9-5-12
Signature of the offender Printed name Date

I hereby certify that the above offender was informed of the obligation to register with local law enforcement as required by IC 11-8-8.

April Wilburn Re-entry Spec 9-5-12
Department official Title Date

Right Thumb



NEXT REGISTRATION DATE:

I attest that I understand my duties and obligations as listed above _____ so dated _____.



TEMPORARY LEAVE AGREEMENT FOR A COMMITTED OFFENDER

State Form 8522 (R3 / 1-12)
DEPARTMENT OF CORRECTION

Name of offender Brown, Jeffrey	Identification number 956175	Facility / Institution NCCF
---	--	---------------------------------------

AUTHORIZATION

This shall serve to identify the above named offender as being lawfully within the limits of Temporary Leave for a Committed Offender (I.C. 11-10-9-2) and serve as authorization for temporary leave and to order his/her return as specified below.

Purpose of temporary leave

Release

Destination

Date leave to begin (month, day, year)

9/6/12

Place to which offender is to return

Time due to return

☒ AM
☐ PM

Date due to return (month, day, year)

9-8-12

Temp leave stops to be followed until

CONDITIONS

1. I will directly and promptly proceed to and return from my designated location by the approved method of transportation and route.
2. I will remain within the prescribed geographical limits and I am not permitted to leave the State of Indiana without written authorization.
3. I will return to the institution immediately and without delay if the reason for which I was released on temporary leave ceases prior to the end of the scheduled time for termination thereof.
4. I will not use, possess or secure alcoholic beverages or any other drug or intoxicant except as prescribed by a licensed physician.
5. I will abide by all institutional regulations governing the temporary leave program as well as all federal, state or municipal laws or ordinances. I am aware that violation of this shall subject me to all penalties prescribed by law or administrative action as deemed appropriate by the institution from which temporary leave was granted.
6. I will make no contact, either personal, by telephone or otherwise with any individual on behalf of another offender.
7. Should I need advice or assistance while on temporary leave, I will telephone my institution of confinement or center, the local parole officer, the Department of Correction, the local sheriff or police department.
8. Should I be involved in an accident or other situation which might prevent my return from leave within the time limits specified above, I will immediately or as soon as possible call my institution of confinement or center or the Department of Correction, and then will turn myself over to the local parole officer, sheriff or police department.
9. I will not purchase any item on credit or enter into any contract to purchase without the advance written approval of the institution head.
10. I will not operate any motor vehicle while on temporary leave.
11. I will use public transportation while on temporary leave, or such transportation as is approved in advance by the institution head.
12. Upon returning to my institution of confinement from a temporary leave, I will not retain any personal property obtained while on leave.
13. I will carry such identification as is provided by the institution of my confinement on my person at all times while on temporary leave.
14. I will not change or deviate from the approved plan for my temporary leave without the advance written approval of the institution head.
15. I will keep this authorization in my possession at all times.
16. Other conditions (specify):

AGREEMENT

I understand that if I should fail to remain within the limits of the above authorization, or fail to return by the prescribed time, such will be deemed an escape from detention (I.C. 35-44-3-5) and shall be punishable as prescribed by state law.

I agree to the conditions of temporary leave which appear above, and acknowledge that the conditions have been read and/or explained to me by the official whose name and signature appears below.

Signature of offender Jeff Brown	Date (month, day, year) 9-5-12
Signature of witness April Wilbourn	Date (month, day, year) 9-5-12
Name of witness (print / type) April Wilbourn	Title of witness Re-entry Specialist

SIGNATURE OF APPROVAL

Signature of head of facility / institution or designee	Title	Date signed (month, day, year)
---	-------	--------------------------------

DISTRIBUTION: Original - Institution packet; Copy - Offender

9/6

NEW CASTLE CORRECTIONAL FACILITY
CLASSIFICATION DEPARTMENT

To: Offender BROWN, JEFFREY

DOCH# 956175

Housing B4 301

From:

Date: 07 30 2012

RE: TRANSPORT UPON RELEASE

9/6

Please indicate below how you plan to leave upon your release.

☐ Family/Friend is picking me up from Facility

☒ NCF is to transport me

Please indicate if you need the facility to provide you with clothing upon your release what sizes you need:

Shirt: 3X

Pants: 38/34

Shoes: N/A

**Please complete this form and return to CLASSIFICATION
Reentry Specialist in Classification within 48 hours.**

H. Wayne Voucher

Office use only:

Placement status: ☒ Approved ☐ Pending

DOC Assist: ☐ Yes ☒ No

Bus Station: ☒ Yes ☐ No TOT: ☐ Yes ☒ No County: _____

Address: _____ City: _____ Zip Code: _____

County: _____

Oct 4, 2002 8:53:22 PM

Printed By: SHEADY from: DCFCNWCS

Received Time: Aug 30, 2012 10:26:59 Source ORI: DCINTER00
Summary: QW: NAM=BROWN,JEFFERY DOB=19640410
View Message Details

IPR.DCINTER00
07:27 08/30/2012 30391
07:27 08/30/2012 07953 IN049065C
*MRI0730827
TXT
RECORD NOT FOUND

Original Query Data
Name: BROWN,JEFFERY
DOB: 1964-04-10
MRI 730834 IN: NLI1 10774 AT 30AUG2012 10:26:59
OUT: DCFCNWCS 117 AT 30AUG2012 10:26:59

Received Time: Aug 30, 2012 10:26:57 Source ORI: INNCIC000
Summary: QW: NAM=BROWN,JEFFERY DOB=19640410
View Message Details

1L01037I,MRI0730827
IN049065C
NO NCIC WANT
NO NCIC WANT NAM/BROWN,JEFFERY DOB/19640410 RAC/W SEX/M ENS/Y
***MESSAGE KEY QWA SEARCHES ALL NCIC PERSONS FILES WITHOUT LIMITATIONS.

MRI 730829 IN: NCIC 19405 AT 30AUG2012 10:26:57
OUT: DCFCNWCS 116 AT 30AUG2012 10:26:57

Received Time: Aug 30, 2012 10:26:57 Source ORI: INHFSN000
Summary: QW: NAM=BROWN,JEFFERY DOB=19640410
View Message Details

IDACS REPLY
IN049065C

NAM/BROWN,JEFFERY.DOB/19640410.SEX/M.RAC/W.I IND/Y.RSH/Y.

**** NO IDACS RECORD FOUND FOR INQUIRY ABOVE ****

MRI 730828 IN: IDACS 21956 AT 30AUG2012 10:26:57
OUT: DCFCNWCS 115 AT 30AUG2012 10:26:57

REQUEST FOR BUS VOUCHER

NAME OF PASSENGER: Jeffrey Brown
DOC#: 956175
DATE OF TRAVEL: 9-6-12
DEPARTURE: HCF Indpls
DESTINATION: Fort Wayne



GATEAGE WORKSHEET
State Form 46753 (7-09)

B4 106

Department of Correction

Date
6/22/2012

Name of Offender JEFFREY BROWN	DOC number 956175	Projected release date 9/08/2012
--	-----------------------------	--

If you are being released on court orders, or to wanting authorities you will not receive Gateage.

As of (Date) 6/22/2012	Amount of Funds on Deposit Outside of Facility	\$ 0.00
	Offenders Trust Fund Balance	\$ 62.52
	Total of Funds Available to the Offender	\$ 62.52

If the total of funds available to the offender is greater than Fifty dollars (\$ 50.00), no Gateage funds will be provided to the offender upon release.

If the total of funds available to the offender is less than Fifty dollars (\$ 50.00), the difference will be determined at this point.

As of (Date) 6/22/2012	Release Funds (Base amount not to be changed)	\$ 50.00
	Less the funds available to the offender	\$62.52
	Equals the amount of Gateage that will be provided	\$ 50.00

Should the funds available to you change in any way, the amount of Gateage will not change. When you are released on or before the projected release

date of **9/08/2012** you will receive Gateage in the amount of \$ **50.00**

Prepared by (Name and position) <i>[Signature]</i>
Received by (Name and DOC number) <i>Jeff S. Brown 956175</i>

DISTRIBUTION: Facility Packet: Offender: Release Coordinator

TFMIACCT
LOC: NCF

OFFENDER TRUST SYSTEM
DISPLAY PRIMARY ACCOUNT

06/22/12 13:55:24
USER: NCF599

ACCOUNT NUMBER: 956175

ACCOUNT STATUS: AC ACTIVE

OFFENDER NAME - LAST: BROWN

LAST STATUS DATE: 12 / 07 / 2011

FIRST: JEFFREY MI: S

DATE RECEIVED : 12 / 07 / 2011
AVL BAL PREV LOC : 0.00
DATE TRANSFERRED : 00 / 00 / 0000
PROJECTED RELEASE: 12 / 14 / 2012
HOUSING DATE : 12 / 15 / 2011
EMPLOYER:

RECEIVED FROM : IYC
(NOTE: THIS AMT IS SUBJECT TO CHANGE)
TRANSFERRED TO :

HOUSING UNIT : B DORM/BLDG/CE
PAY FREQUENCY: COUNSELOR:

COMMISSARY RESTRICTIONS:

BEGINNING DATE: 00 / 00 / 0000
ENDING DATE : 00 / 00 / 0000

BIRTH DATE : 04 / 10 / 1964
RE-ENTRY ACCT PARTICIPANT: Y

PRIMARY ACCT BAL : 9.51
HOLD BALANCE : 0.00
HOLD RELEASE BAL : 0.00
AVAILABLE BALANCE: 9.51
PENDING BALANCE : 0.00
RE-ENTRY ACCT BAL: 53.01
DATE LAST TRANS: 20120620 TXN CODE: SAVD

ACCOUNT RECORD FOUND. ENTER NEXT SELECTION

PF2=>GET ACCOUNT PF5=>NEXT ACCOUNT PF6=>PREV ACCOUNT PF9 =>CLEAR SCREEN
PF3=>GET NAME PF8=>NEXT NAME PF7=>PREV NAME PF10=>EXIT TO MENU

4-©

1 Sess-1

10.1.23.59

TCP03234

4/19